

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
v.)	Case No. 1:14-CR-213
)	
MARCEL LEHEL LAZAR,)	Hon. James C. Cacheris
)	
Defendant.)	

UNOPPOSED MOTION TO EXTEND MOTIONS DEADLINE

Marcel Lehel Lazar, through and by counsel, respectfully moves this Court to extend the motions deadline in this case by 30 days to June 15, 2016. The government does not oppose this request. In support of this Motion, counsel states:

1. In June 2014, Mr. Lazar, a citizen and resident of Romania, was charged in the Eastern District of Virginia in a nine-count indictment with wire fraud, unauthorized access of a protected computer, cyberstalking and aggravated identity theft.
2. Thereafter, Mr. Lazar was extradited from Romania to this District on the basis of the pending indictment. He arrived in this District on March 31, 2016.
3. On April 14, 2016, Mr. Lazar was arraigned in this Court, at which time the Court scheduled the matter for trial on September 12, 2016, and set a motions' due date of 30 days, making the deadline May 15, 2016.
4. The government is still in the process of producing discovery to the defense in this case, a cumbersome process due to the electronic nature

and volume of the discovery. As a result, counsel for Mr. Lazar requires additional time to receive and review discovery in order to assess whether there are any pretrial motions to file in this case.

5. The government does not oppose the relief requested herein.

Wherefore, the defense respectfully requests that this Court extend the motions deadline to June 15, 2016.

Respectfully submitted,

MARCEL LEHEL LAZAR
By Counsel,

Jeremy Kamens,
Federal Public Defender

By: /s/ Shannon S. Quill
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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2016, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to:

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Pursuant to the Electronic Case Filing Policies and Procedures, a courtesy copy of the foregoing pleading will be delivered to Chambers within one business day of the electronic filing.

/s/ Shannon S. Quill
Shannon S. Quill